

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COUNTER TERRORIST GROUP US and J. K.
IDEMA,

Plaintiffs,

v.

ASSOCIATED PRESS, ASSOCIATED PRESS TV
NEWS, PAUL HAVEN STEPHEN GRAHAM,
JASON STRAZZIO, AMIR SHAH, JOHN DOES 1-
7.

Defendants.

X

Index No. 07-CV-6299 (DAB)

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Gayle C. Sproul, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

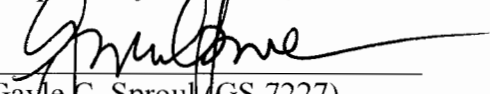
Applicant Name: Michael Berry
Firm Name: Levine Sullivan Koch & Schulz, L.L.P.
Address: 2112 Walnut Street, Third Floor
City/State/Zip: Philadelphia, Pennsylvania 19103
Phone Number: (215) 988-9773
Fax Number: (215) 988-9750

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2007 OCT 25 PM 3:25

Michael Berry is a member in good standing of the Bar of the States of Pennsylvania and New Jersey. *See* Exhibits A & B. There are no pending disciplinary proceedings against Michael Berry in any State or Federal court.

Dated: October 24, 2007
New York, New York

Respectfully submitted,


Gayle C. Sproul (GS 7227)
Levine Sullivan Koch & Schulz, L.L.P.
321 West 44th Street, Suite 510
New York, New York
(212) 850-6100 (phone)
(212) 850-6299 (fax)

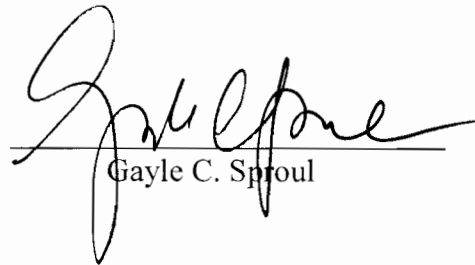
07-10-56-01
ST# 751130

CERTIFICATE OF SERVICE

I, Gayle C. Sproul, hereby certify that on this 25th day of October, 2007, I caused to be served a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice, as well as the accompanying declaration and proposed order, to be served upon the following counsel of record via first-class mail, postage prepaid:

John E. Tiffany, Esquire
The Robert Treat Center
50 Park Place, 10th Floor
Newark, New Jersey 07102

Vijayant Pawar
Law Offices of VIJAYANT PAWAR
35 Airport Road, Suite 330
Morristown, New Jersey 07960



Gayle C. Sproul



Supreme Court of Pennsylvania

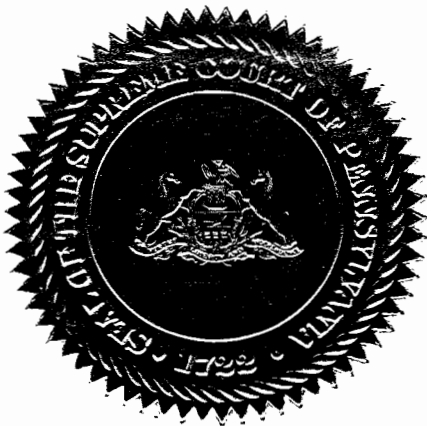
CERTIFICATE OF GOOD STANDING

Michael Louis Berry, Esq.

DATE OF ADMISSION

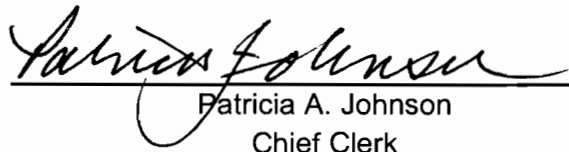
November 28, 2000

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: October 22, 2007


Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

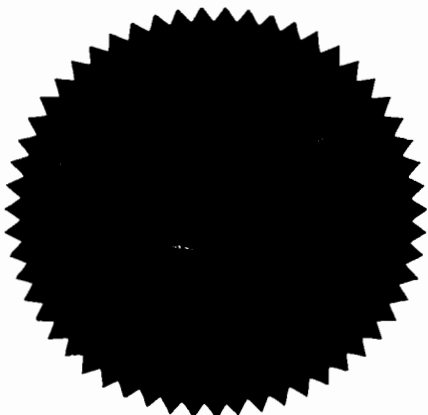


Certificate of Good Standing

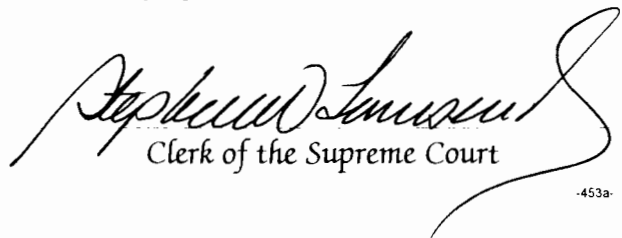
This is to certify that **MICHAEL LOUIS BERRY**
(No. **027192000**) was constituted and appointed an Attorney at Law of New
Jersey on **December 07, 2000** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
23RD day of October , 20 07


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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COUNTER TERRORIST GROUP US and J. K. IDEMA,	: Index No. 07-CV-6299 (DAB)
	:
Plaintiffs,	:
v.	:
ASSOCIATED PRESS, ASSOCIATED PRESS TV NEWS, PAUL HAVEN STEPHEN GRAHAM, JASON STRAZZIO, AMIR SHAH, JOHN DOES 1-7.	: DECLARATION OF GAYLE C. SPROUL IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE
	:
Defendants.	:
-----	X

I, Gayle C. Sproul, hereby declare, under penalty of perjury as follows:

1. I am a partner in the law firm of Levine Sullivan Koch & Schulz, L.L.P. and am counsel for The Associated Press and Associated Press Television News, Inc. (collectively referred to as "AP") in the above-captioned matter. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Associated Press' motion to admit Michael Berry as counsel pro hac vice to represent AP in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on July, 23 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3. I have known Michael Berry since 2001.

4. Michael Berry is an associate at Levine Sullivan Koch & Schulz, L.L.P., resident in the firm's Philadelphia, Pennsylvania office.


5. I have found Michael Berry to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Michael Berry, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Michael Berry, pro hac vice, which is attached hereto as Exhibit A.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 24, 2007.


Gayle C. Sproul (GS 7227)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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COUNTER TERRORIST GROUP US and J. K. IDEMA,	:	Index No. 07-CV-6299 (DAB)
	:	
Plaintiffs,	:	
v.	:	ORDER FOR ADMISSION
ASSOCIATED PRESS, ASSOCIATED PRESS TV NEWS, PAUL HAVEN STEPHEN GRAHAM, JASON STRAZZIO, AMIR SHAH, JOHN DOES 1-7.	:	PRO HAC VICE ON WRITEN MOTION
	:	
Defendants.	:	
-----	X	

Upon the motion of Gayle C. Sproul, attorney for The Associated Press and Associated Press TV News, Inc., and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

Applicant Name: Michael Berry

Firm Name: Levine Sullivan Koch & Schulz, L.L.P.

Address: 2112 Walnut Street, Third Floor

City/State/Zip: Philadelphia, Pennsylvania 19103

Telephone: (215) 988-9773

Email Address: mberry@lskslaw.com

is admitted to practice pro hac vice as counsel for The Associated Press and Associated Press TV News, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

Batts, U.S.D.J.